

DEFENDANTS’ EXHIBIT 20

July 15, 2025

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

* * *

Defendant's 30(b)(6)
Deposition Exhibit

Case No. 2:25-cv-00524-NR

DX 20

exhibitster.com

STUDENTS FOR JUSTICE IN : NO.
PALESTINE AT PITT, : 2:25-cv-00524-NR
Plaintiff :
:
vs. :
:
UNIVERSITY OF PITTSBURGH, :
et al., :
Defendants:

* * *

Zoom Deposition of [REDACTED]

beginning at 10:00 a.m., on Tuesday, July 15,
2025, before Karen A. Stevens, Professional
Court Reporter and Notary Public, there being
remotely present:

A P P E A R A N C E S :

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KIRSTEN HANLON, ESQUIRE
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-- Representing the Plaintiff

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ALSO PRESENT: NIKKI RHODES, ESQUIRE
ALI SZEMANSKI, ESQUIRE
JULES LOBEL, ESQUIRE

I N D E X

* * *

WITNESS: [REDACTED]

QUESTIONED BY:

PAGE

Mr. Richards

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D O C U M E N T R E Q U E S T

* * *

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(None)

WITNESS INSTRUCTED NOT TO ANSWER

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E X H I B I T I N D E X

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(It is hereby stipulated by and among counsel for the respective parties that signing, sealing, filing and certification are waived; and that all objections, except as to the form of the questions, be reserved until the time of trial.)

* * *

after having been first duly sworn, was examined and testified as follows:

* * *

E X A M I N A T I O N

* * *

BY MR. RICHARDS:

Q Good morning, [REDACTED]. My name is Josh Richards. Am I pronouncing your name correctly?

A Yes.

Q Okay. Could you please just state your full name for the record?

A [REDACTED].

Q And do you understand, [REDACTED], that you're here today to testify on behalf

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1 of Students for Justice in Palestine at Pitt
2 and that the deposition you'll be giving will
3 be on behalf of that organization?

4 A Yes.

5 Q If you could briefly state what
6 your role is? And I'm going to call Students
7 For Justice of Palestine at Pitt just SJP to
8 make things easier and you should feel free
9 to do that too, just to shorten things. So
10 could you just briefly state what your role
11 is at SJP?

12 A The past academic year I served as
13 co-president for SJP.

14 Q Okay. And you held that position
15 just for the past academic year or you held
16 that before then as well?

17 A Just for the past academic year.

18 Q Okay. Can you describe your
19 responsibilities in that position, please?

20 A I would say to lead and guide the
21 activities and communications of the
22 organization.

23 Q Okay. Thank you. Now that we sort
24 of have that bit out of the way with respect
25 to your ability to testify on behalf of SJP

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1 nature.

2 Q And what events had SJP planned for
3 that week prior to the imposition of the
4 suspension?

5 A Sorry, can you clarify your
6 question?

7 Q What events had SJP planned for
8 this year prior to its suspension.

9 A Because SJP has been unsure about
10 the status of the organization upon returning
11 for the fall semester, nothing concretely has
12 been planned.

13 Q Having now reviewed Exhibit 2 in
14 its entirety, is there anything in Exhibit 2
15 that you believe is inaccurate?

16 A No.

17 MR. RICHARDS: We can take
18 down Exhibit 2. And can you put up
19 Exhibit 3?

20 * * *

21 (Whereupon, the above-mentioned
22 document was marked for
23 identification as Exhibit-3.)

24 * * *

25 (Whereupon, a document was displayed.)

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1 also -- sorry. Also David Day, I believe.

2 Q So David Day and DaVaughn
3 Vincent-Bryan in addition to receiving this
4 letter would have heard everything that was
5 said at this hearing as well, correct?

6 A Correct.

7 Q Who is Zachary Davis?

8 A One of the adjudicating board
9 members.

10 Q Why did SJP send the open letter to
11 Zachary Davis?

12 A For the same reason, to dismiss the
13 disciplinary proceedings against SJP.

14 Q Did SJP believe that Zachary Davis
15 as a board member at the hearing had the
16 authority to dismiss the charges?

17 A Like I said before, anybody who was
18 involved in the disciplinary proceedings,
19 whether or not they directly had the
20 authority to dismiss the proceedings or were
21 in some capacity involved, were recipients.

22 Q And I think you testified earlier
23 that your understanding was that the hearing
24 board members, including Zachary Davis, were
25 responsible for making the decision about

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1 whether or not you would be found responsible
2 for violating University policy; is that
3 correct?

4 A Yes.

5 Q Just to clarify, by you I meant
6 SJP, in case that changes your answer.

7 A Yes.

8 Q And does the same explanation apply
9 as to Jennifer Toscano and Carlton Scott?

10 A Yes.

11 Q What about the recipients who were
12 CC'd on the letter? Why was the letter sent
13 by SJP to Diversity?

14 A As was outlined in the open letter
15 SJP felt that this was viewpoint
16 discrimination on the basis of SJP's
17 messaging. So the Office of Diversity,
18 Inclusion and Belonging was included.

19 Q Who is David Darr? Sorry, J Darr.
20 My apologies.

21 A I believe he works within either
22 DEI or another student affairs office.

23 Q Who is Clyde Wilson Pickett?

24 A Again, I cannot remember
25 specifically what his exact position is, but

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1 School Of Law, so it was signed by mistake.

2 Q I will just again for the record
3 repeat that topic number 7 in the Deposition
4 Notice was specifically the signatories to
5 the open letter. And so I will ask you again
6 if in your preparation for this deposition
7 you prepared to answer about who from the
8 University of Pittsburgh School Of Law
9 provided the information on the sheet -- on
10 the form, rather, that SJP relied on in
11 adding them to the open letter.

12 A No, that was not part of the
13 preparation, unfortunately.

14 Q What do you know, if anything,
15 about the decision to include the University
16 of Pittsburgh School Of Law on the list of
17 recipients?

18 A At that point in time we had not
19 realized that it was a mistake, so that's why
20 it was included on the E-mail. But once it
21 was realized that that was a mistake and that
22 was not actually somebody authorized to sign
23 on behalf of the law school, it was redacted
24 from the Instagram post that had the
25 signatories on it.

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1 you're asking.

2 Q Sure. You testified earlier that
3 the purpose of the open letter was to
4 influence all of the recipients to drop the
5 conduct charges, correct?

6 A Yes.

7 Q And would you agree that as a
8 recipient of a letter like this an employee
9 of the University could be intimidated when
10 it sees that the letter is signed by the
11 University's law school?

12 A I would say likely. I don't
13 necessarily think that intimidation is the
14 first word that would come to my mind to
15 describe like a feeling that that would
16 elicit, but perhaps.

17 Q And would you agree that that
18 sentiment could interfere with the conduct
19 process?

20 A Could, perhaps. I don't think it
21 would be likely, but possibly.

22 MR. RICHARDS: Can we put up
23 Exhibit 5?

24 * * *

25 (Whereupon, the above-mentioned

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1 just to be clean here, have you seen Exhibit
2 5 before?

3 A Yes.

4 Q What is Exhibit 5?

5 A The University Student Code Of
6 Conduct.

7 Q And in your capacity as a leader of
8 SJP, are you familiar with the Pitt Student
9 Code Of Conduct as it applies to registered
10 student organizations?

11 A Yes.

12 MR. RICHARDS: Can we put
13 Exhibit 6 up, please?

14 * * *

15 (Whereupon, the above-mentioned
16 document was marked for
17 identification as Exhibit-6.)

18 * * *

19 (Whereupon, a document was displayed.)

20 BY MR. RICHARDS:

21 Q Have you seen Exhibit 6 before,
22 [REDACTED]?

23 A Yes.

24 Q What's Exhibit 6?

25 A The Student Organization Handbook.

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1 was it in terms of counsel that we had
2 present.

3 Q Apart from Mr. Worlds and
4 Ms. Hanlon did SJP bring anyone else to the
5 hearing?

6 A No.

7 Q Do you remember the names of the
8 people that served on the hearing panel?

9 A No.

10 Q I will represent to you that they
11 were Summer Rothrock, Amanda Rice and Lynn
12 Miller. Does that sound correct?

13 A Yes.

14 Q Okay. As to -- well, did you --
15 did SJP have a relationship with any of those
16 panel members prior to the hearing?

17 A No.

18 Q As to Summer Rothrock, did you then
19 or do you now have any basis to believe that
20 she had any improper bias against SJP?

21 A No.

22 Q Do you believe that she had any
23 basis to engage in viewpoint discrimination
24 against SJP?

25 A No.

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1 Q As to Amanda Rice, do you have any
2 basis to believe that she had any improper
3 bias against SJP?

4 A No.

5 Q Do you have any basis to believe
6 that she engaged in viewpoint discrimination
7 against SJP?

8 A No.

9 Q As to Lynn Miller, do you have any
10 basis to believe that she had any improper
11 bias against SJP?

12 A No.

13 Q Do you believe that she had any
14 basis -- do you have any basis to believe
15 that she engaged in viewpoint discrimination
16 against SJP?

17 A No.

18 Q Do you have any basis to believe
19 that any of the three of them had any basis
20 to engage in retaliation against SJP?

21 A No.

22 Q Did SJP send a communication to the
23 hearing board from the May hearing?

24 A No.

25 Q As a result of that second hearing

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1 Q Did you ever ask anyone in the
2 University to clarify that point, to make
3 clear whether you could or could not hold
4 off-campus events?

5 A As of this current finding we
6 haven't asked. But what I was referencing
7 earlier, we didn't think that the speech that
8 the University could police would be able to
9 be extended to off-campus speech. And the
10 University never really gave us an exhaustive
11 list of like the conditions of being on
12 interim suspension. So we kind of just
13 assume now the University is going to take it
14 upon themselves to also campus(sic)
15 off-campus speech.

16 Q Just to be clear, I'm only asking
17 right now about the current suspension, not
18 about the interim suspension or the terms of
19 the interim suspension. I'm just asking, and
20 it sounds like you said the answer's no,
21 whether you asked the University to clarify
22 whether or not you could hold off-campus
23 events. That's accurate?

24 A Yes.

25 Q Just to make sure that I understand

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1 please just answer within the scope of your
2 counsel's previous instructions.

3 A [REDACTED]

4 Q [REDACTED]

5 [REDACTED]

6 A [REDACTED]

7 Q [REDACTED]

8 [REDACTED]

9 A [REDACTED]

10 Q [REDACTED]

11 [REDACTED]

12 A [REDACTED]

13 Q When you say the SJP board are you
14 referring to the 18 people that comprised the
15 board and the executive board?

16 A Yes.

17 Q [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 A [REDACTED]

21 Q Do you remember earlier in your
22 deposition I asked you whether or not SJP's
23 goals included disrupting the normal
24 functioning of the University?

25 A Yes.

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1 Q Do you recall your answer?

2 A It was no.

3 Q [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 A [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 Q [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 A [REDACTED]

20 [REDACTED]

21 Q [REDACTED]

22 [REDACTED]

23 A [REDACTED]

24 Q What's the date of this document?

25 A I can't recall.

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1 the record.

2 MR. WORLDS: Yes, we would
3 welcome that conversation.

4 MR. RICHARDS: Why don't we go
5 off the record.

6 THE COURT REPORTER: Is an
7 E-mailed transcript okay?

8 MR. WORLDS: Yes, ma'am.
9 Thank you.

10 MR. RICHARDS: Yes, you can
11 send it to Mary Hutchings.

12 * * *

13 (Witness excused.)

14 * * *

15 (Whereupon, the Zoom deposition
16 concluded at 2:50 p.m.)

17 * * *

18

19

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21

22

23

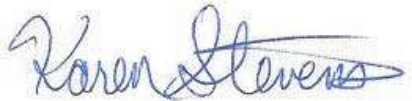
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C E R T I F I C A T I O N

I, Karen A. Stevens, a Court Reporter and Notary Public, do hereby certify the foregoing to be a true and accurate transcript of the proceedings in this matter, as transcribed from the stenographic notes taken by me.



Karen A. Stevens
Court Reporter
Notary Public

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